

USDA - APHIS

TRANSCRIPT OF PUBLIC COMMENTS RECEIVED DURING THE  
NATIONAL ANIMAL ID PROGRAM LISTENING SESSION

TUESDAY, AUGUST 31, 2004

ST. CLOUD CIVIC CENTER  
ST. CLOUD, MINNESOTA  
8:30 A.M.

IN ATTENDANCE:

BILL HAWKS, UNDER SECRETARY, MARKETING AND REGULATORY PROGRAMS

DR. VALERIE RAGAN, ASSISTANT DEPUTY ADMINISTRATOR

MARY THORNHILL, MODERATOR

(The meeting began at 8:32 a.m. and opening comments were made by Mr. Bill Hawks and Dr. Valerie Ragan.)

MS. THORNHILL: Okay. We're ready to start with the comments now. Our first five speakers on the list are Larry Liefel, Steve Peterson, Sue Beitlich, Robert Carlson, and Donavon Stronger.

MR. LEOPOLD: Good morning. I am Larry Liefel. I'm president of the Minnesota Pork Producers Association. My wife, Jill, and I have a swine operation and crop operation in southern Minnesota. Thank you for allowing us this opportunity today.

Minnesota Pork Producers' Association is a voluntary membership association with nearly 3,000 Minnesota pork producers, contract growers, and their employees. Nationally, Minnesota ranks third in hog production with 13 million head produced annually. Our membership accounts for two thirds of that production.

MPPA supports national mandatory animal identification. Such a system will protect the nation's food supply in the event of animal disease outbreak or the introduction of a pathogen or toxin in the food supply. A mandatory national animal ID system will protect Minnesota's 1.7 billion dollar hog industry and the nation's \$100 billion livestock industry and will protect and secure the nation's food animal supply. America's pork producers take this responsibility very seriously.

MPPA supports the following principles for animal identification: that it is a single mandatory national program with uniform standards that includes all livestock species; that it is a practical animal health management tool that includes assessment and response to intentional or unintentional introduction of foreign pathogens or toxins; that it has a 48-hour traceback capable of identifying premises that had direct contact with animals; that it becomes part of a national plan to protect the food and agriculture sector; that is confidential and secure in the information system; is a credible system that meets the demands of our international trading partners in this post-BSE world; and that it is not a financial burden to US pork producers due to onerous additional requirements and costs.

While we advocate that species be included--all species be included in national animal ID, the plan needs to be species specific. There are differences between species such as--diseases, production practices, recordkeeping, animal movement, and animal values. Specifically, with pork production, the

identification of market hogs back to the last premise, this will result in rapid and accurate traceback.

This accuracy could facilitate further traceback to origin premises because today hogs generally move in lots. Recordkeeping in our industry is by and large based on group or lot movements.

A three-phase program being envisioned for pork production includes, phase 1, a premise ID; phase 2, a group/lot ID; and phase 3, external tracking. There remain, however, important questions to answer and negotiate for a successful ID program, we feel. Who will pay for the program? We believe that--in cost sharing between producers, the private and the public. Where is the data housed? We believe in complete confidentiality. And who will apply the identification? We support a program that's flexible and includes all species.

The MPPA would like to thank USDA for establishing grants that put into place pilot projects for the national animal ID System and especially the one awarded to Minnesota. We encourage additional grant funding be made available to assist the swine industry in a multi-state effort and explore and promote new technologies for specific swine ID.

I want to stray--okay. Thank you.

MR. PETERSON: This country's animal agriculture producers, including the Holstein Association USA's 35,000 members, are at risk today with the threats of additional cases of BSE in this country and the threat of hoof and mouth disease. It is our belief that animal identification for production animal agriculture in this country needs to be mandatory.

Additionally, it cannot be technology neutral. The RFID, or radio frequency ID technology, is the most accurate, efficient, and cost-effective form of animal ID used in the world today and will likely be for the years to come.

Without a mandatory national animal identification program in this country, we will continue to be denied market access to certain countries throughout the world. Currently, 58 countries have banned US beef since BSE was identified in Washington State late last year.

The National FAIR, Farm Animal Identification and Records Program, which is coordinated by the Holstein Association, is an animal ID and traceability program in place and working today that incorporates RFID tags. The National FAIR program provides each animal with a unique identification

number and uses electronic RFID tags to identify and track the animals. Similar to a Social Security number or a car's vehicle identification number, the number stays with the animal for its lifetime.

The Holstein Association USA has worked cooperatively with USDA APHIS and Veterinary Services since 1999 to design, develop, and demonstrate a pilot project for a national livestock identification program that will trace livestock from farm to farm, farm to market, and market to processing unit. The goal has been accomplished. The National FAIR program has been identifying and tracing animals from birth to slaughter for several years.

The National FAIR program has an infrastructure already in place consisting of a comprehensive database, a dedicated tag provider, and a coordinated field service staff.

The National FAIR program was developed by producers, for producers. Currently there are over 1.3 million animals in the National FAIR database and information stored securely in the FAIR system includes where and when the animal was born, what locations the animal has been at, such as farms, markets, or processing plants, what livestock the animal has been in contact with, and eventually where and when the animal was slaughtered.

The information on the National FAIR database allows for tracing of animal movement from birth to slaughter in as little as a few minutes. As part of this system, tag readers designed to read electronic tags are already in place in markets and processing facilities throughout the United States.

Ladies and gentlemen, now is not the time to reinvent the wheel. National Animal Identification needs to be implemented in the United States now. Thank you.

DR. RAGAN: Excuse me. What was your name?

MR. PETERSON: Steve Peterson.

DR. RAGAN: With the Holstein Association?

MR. PETERSON: Correct.

MS. BEITLICH: On behalf of the nearly 3,650 family farm members of the Wisconsin Farmers Union, thank you for the opportunity to comment on the implementation of a National Animal Identification Program. I am Sue Beitlich and I serve as president of the Wisconsin Farmers Union.

In addition to serving as the president, my husband and I own and operate a 50-cow dairy farm in

western Wisconsin, raising our own replacement heifers, and have about 125 Holstein animals on our farm. We do have personal concerns regarding an animal ID system, but also understand the need for a trace back system for our animals for ID reasons.

Today I'd like to address the concerns coming from producers in the countryside about mandatory animal identification and to urge the following concerns be adequately addressed by the Administration and Congress before further promulgation or implementation of a verifiable national animal ID program.

The cost of implementing and maintaining the program remains uncertain. USDA estimates the cost of development of an ID system at \$550 million for over five years and has requested only \$33 million per year for implementation. With USDA planning to provide only one third of the cost, the remaining costs are to be paid for by state governments and industry participants.

Wisconsin Farmers Union believes the solution would be that in light of the fact that the Department of Homeland Security has stated the necessity of the national animal ID program to combat terrorism, we would urge DHS to provide the funding necessary to create and maintain the database and providing compensation to producers for their cost of implementing the system. Our farmers simply cannot bear added costs to their already tight production costs. We need U.S. producers to remain competitive in the marketplace.

The liability and confidentiality issue. The use of the proprietary information should include clear limits and firewalls to ensure the information is not used by packers to discount producer prices, nor should the information be subject to a Freedom of Information Act inquiry; therefore, we urge the information collected be maintained at the government level to ensure that private and public access is not allowed. We agree with USDA that it should pursue only a voluntary system until the confidentiality issue is resolved.

A question that surfaces frequently among farmers is, what happens if a disease outbreak is traced back to my farm? This liability issue must be fairly addressed by not placing an undue burden on producers. Producers should not be held liable for any food contamination incidents that occur, such as e. coli, when meat is improperly processed or handled. This is clearly beyond the farmer's control.

And Country of Origin Labeling. Wisconsin Farmers Union believes that a National Animal ID System would provide the necessary tools to maintain a mandatory COOL system at the retail level.

COOL was signed into law with the 2002 Farm Bill. USDA should use mandatory animal ID as an opportunity to implement mandatory COOL. The Secretary of Agriculture has the discretionary authority to implement COOL in a common-sense manner that bears the minimum bureaucratic or financial burden on producers, processors, and retailers.

COOL and Animal ID are very connected. It's a win/win solution. We know our farmers want a labeling program, U.S. consumers want it, and most importantly, our trading partners want it. Coordination of the two programs is vital to ensure our producers are not adversely economically impacted by paying the bill for the benefit of processors. Thank you very much.

MR. CARLSON: Good morning. My name is Robert Carlson. I'm president of the North Dakota Farmers Union, the largest general farm organization in the state of North Dakota. Today I represent more than 36,000 families who thank you for the opportunity to comment on the implementation of the National Animal Identification Program.

The livestock industry in North Dakota comprises nearly 19 percent of our agricultural cash receipts, with cattle and calves accounting for 14 percent of those receipts. Our state is home to 30,000 farms, 13,000 of which raise cattle. The implementation of an animal ID program will have a huge impact on livestock producers in our state.

I wish to address briefly five areas this morning. Number one, the cost burden to producers. The cost of implementing and maintaining a verifiable identification system is of great concern to livestock producers faced with front-line responsibility for any ID program. Because the program is of national scope and interest, we believe that it may be more appropriate for the public to bear a greater burden of both the development and day-to-day management costs associated with the program. It is vital that a disproportionate amount of the costs do not fall on livestock producers, particularly smaller producers, which would make them less positioned to remain competitive in the marketplace.

Number two. Liability protection and data sharing. I was gratified to hear your comments from USDA regarding those issues, and let me just say that we agree with those without reading this section to you. We do want to stress, however, that we believe that producers should not be held liable from any food contamination incidents that occur, such as e. coli contamination, when meat is improperly processed or

refrigerated and beyond the control of farmers and ranchers.

Number three, country of origin labeling. North Dakota Farmers Union believes that information gathered through a National Animal ID Program should be maintained and utilized to augment mandatory country of origin labeling at the retail level. An ID system would complement a labeling program and provide further verification of origin information. Consumers would also be able to select food products, knowing that the two programs have strengthened America's ability to identify and contain food pathogens or other food safety factors prior to products reaching the retail shelf.

Most importantly, the identification and traceability of foreign animals and meat in the American food supply must be addressed. How will a national ID program address this issue is associated with foreign livestock and meat.

Number four, industry participation. It's vital for the success of any animal ID program that there be full participation and shared responsibility throughout all livestock industries for the program, and I think we've heard already positions very similar to ours. Some animals are different from others, and we need to take that into account.

Number five, producer responsibilities. And in conclusion, we agree with USDA's proposal to do an education program with producers. We think that's vital, and that education will help prevent errors that may occur and make the program work much better. So we look forward to working with you and doing that function among the producers. Thank you very much.

MR. STROMBERG: Good morning. My name is Donovan Stromberg. I'm a dairy producer from Oraxx, Minnesota, and I'm representing the Minnesota Farm Bureau Federation. I want to start by saying, the Minnesota Farm Bureau Federation stands in strong support of developing and implementing a National Animal Identification System designed for disease control and eradication as well as an aspect of food safety.

Minnesota is a diverse state in terms of livestock production, and while the BSE case and cattle-related issues have garnered most of the headlines, it's critical to remember that over the last several years Minnesota poultry, sheep, and hog producers have been adversely affected by Exotic Newcastle, low pathogenic avian influenza, scrapie, and pseudorabies.

The Farm Bureau believes there are four key issues that must be addressed in order to ensure producer acceptance of animal ID. Confidentiality, cost, liability, and education.

On confidentiality, the biggest concern we hear from Minnesota livestock producers is, what types of information will be collected and if that information will be confidential. The system should be collecting the data necessary to establish an identification system for disease control. We must guard against expanding the scope of this system, which might attempt to collect information for regulatory purposes. If we cannot guarantee an explicit mission of disease control and a strong level of confidentiality, I fear that any system will encounter reluctance on the part of producers to readily participate.

We also need to clearly define who will have access to the information collected. Furthermore, we will have to work on state level privacy issues to ensure that information collected by our State Board of Animal Health also is confidential.

Cost. A cost-effective nationalized system of livestock identification with equitable cost share among government, industry, and producers must be established. While we can accept reasonable producer costs to support the effective program, we believe costs should be balanced and shared among all others who ultimately benefit. The public good, which will certainly be enhanced by this program, should be considered when determining who pays the bill.

Currently it appears that about one third of the system's cost will be falling to producers via additional labor and tagging expense. Producers cannot and should not bear an unfair share of the cost.

Liability. Many producers also worry that they might be forced to share liability for food safety that are now limited to meat merchandisers. An ID system must protect producers from liability for acts of others after the livestock leaves producers' control. This includes concern about nuisance suits that name everyone who handled particular livestock.

Education. It's critical that producers fully understand what an animal ID system will and won't do. Farm Bureau will recommend the establishment of an advisory board to help guide an animal ID system. The board should be comprised of producers, processors, and animal health authorities and the USDA. Further exploration would be appropriate to enhance the system so it can be used as the basis for



marketing programs, which--should producers choose to voluntarily implement programs with an ID component. It only seems appropriate that further ID systems could enable producers to perceive value-added marketing opportunities and incorporate the ID system into their own production record systems. Thank you.

MS. THORNHILL: The next five speakers are Bill Hartmann, Dennis Schoeden, Bruce Dokkebakken, Dale Luke, and Dan Hammond. Oh, Bill Hartmann has already spoke, so perhaps Steve Olson would like to come up, and we will start with Dennis.

MR. SCHOEDEN: Good morning, and the--I'm Dennis Schoeden from Minnesota Farmers Union. I'm the vice president, also a cattle operator at my family farm in Cambridge, Minnesota. And we certainly wish to thank Mr. Secretary and your staff for coming to St. Cloud, Minnesota, to take part in this.

I would just like to say that we're very concerned about our family farm system in Minnesota. This program is vital to each and every one of us. Our beef cow/calf operations is a very strong part of our state. The average size of our cow operation is 30 cows. The average size--the average dairy herd is 75 head. We have 4,000 herds of dairy in Minnesota that milk under 50 cows, and the impact on each of our local communities of these family farms is so important for the structure of the state of Minnesota.

And again, we're grateful that we have these organizations working together to help implement this very important program. We do have to have firewalls so the cost does not exceed the purpose of the average farmer having to be a part of this program so they stay farming.

We also would like to see this program interface with the ID--with animal--with the COOL program. And what really hits home to me today is, the Minnesota State Fair is in operation at this time, and at our Farmers Building at our fair, we have a petition asking people what they think of COOL, the animal--about where that meat is--originated from. And you know what, we have hundreds of our city cousins that stop in every day to talk about how interested they are in where their food is produced and where it comes from, and we'd sure like to see this enacted, the COOL program.

Again, we want to thank you for taking the time and for the money to implement this program, and we sure want to say that our organization certainly supports it, wants to work with the other groups to make this a success. Thanks a lot.

MR. DOKKEBAKKEN: Hello. My name is Bruce Dokkebakken, general manager of Minnesota Dairy Herd Improvement Program. I'd like to thank Secretary Hawks for having the wisdom to be in Minnesota instead of New York. I'd like to thank Dr. Valerie Ragan for all of her good work on this ID program as well as her other functions at USDA. She's provided a lot of good leadership. I'd like to thank our Minnesota leaders, Gene Hugoson and Bill Hartmann, for the leadership they give in animal agriculture.

This project of animal identification is one of the most complex and challenging undertakings I think any of us could ever envision. We're looking at a variety of species, a variety of different farm management systems, farmers, hobbyists, markets, just a whole host of different problems that we need to overcome. At the end of the day, I think we need to keep in mind that our goal here is to develop a system that works, and ultimately that works for the American people. So with that in mind, I'll put my DHI hat back on.

I have visited with over 500 of our members, and I want to assure you that we strongly support development and rapid implementation of a National Animal ID System. The system is critical to the future of animal agriculture as we address emerging animal health issues. NAIS will help protect our animals and our livelihood.

DHIA has been tracking animal identification for over 99 years. For 50 years we have been using computers for tracking animal identification and movement. For almost that long we have been sending identification and production data to USDA.

Minnesota DHIA has a field force of 90 that operates in all areas of the state. The rest of that kind of commercial for DHIA, I guess I'll leave on the electronic version that I've already provided.

In addition, the DHIA system has served as a USDA ID tag distributor to dairy producers and it has for many years. We are experienced in the area and ready to serve any function that might help with the AIN manager and distributor system for NAIS.

We encourage USDA to finalize the required standards so that we can begin to work in this area. I routinely get phone calls from our producers who need to go out and buy tags and they want to buy the right tags right now to put in their calves and not have to chase those animals around two or three years

from now to put the tags in that are needed.

We recognize producer concerns over confidentiality of information is valid. It has been our experience that we have been able to effectively share information with USDA without putting producers and their information at risk. We need to be sure that this is done through NAIS as well.

To summarize, the DHI system provides an opportunity for the national ID system to partner with a voluntary producer led organization, that is trusted by producers and industry, and has a long history of excellence in data collection and transfer. This partnership would minimize duplication of reporting by dairy producers and provide the NAIS with immediate access to a system that can collect the added information that is needed, as well as an organization with the experience needed to be AIN managers and distributors. DHIA now focuses on dairy, but it can readily be made available to other species. Our organizations welcome the opportunity to work with producers of any livestock species in this effort.

I have a present before I go. We talked about technology neutral, and I want to make sure that we don't get technology neutered out of that. So there is an RFID tag, and here is the current USDA tag. And the light isn't right in here to try to read this. Put that on a cow's ear, line up 100 cows behind her and read that. I'm sorry, what did you say?

MR. HAWKS: You're getting commercial.

MR. DOKKENBAKKEN: That's the technology we're talking about.

MR. LUICK: Good morning. My name is Dale Luick. I'm the current chairman of the cow/calf council for the Minnesota State Cattlemen's Association. Our president, Steve Brake, sends his regrets that he wasn't able to be here today, but he's up to his ears in cattle and concrete and a few other things this morning. I've got a cow/calf operation 80 miles north of here. I've got registered Angus; I've got registered Tarentaise; and I've got commercial stock cows, so I've got two mandatory ID systems and I've got my own ID system that I have to deal with.

The state Cattlemen's Association is made up of 25 local Cattlemen's Associations throughout the state of Minnesota. We're also affiliated with the National Cattlemen's Association. I'd like to thank you for coming here and allowing us to speak on this issue, and I know you put a lot of miles in.

The state Cattlemen's Association absolutely supports the national identification system. We

know it's critical for three reasons. One is disease control. That's our own insurance here that we're talking about. Secondly, the ability to trade cattle within the U.S. and in the--in the foreign markets is--simply dictates it. We're frankly behind in this area, and the other part of that is, as an industry we understand that we have to be able to identify our own cattle and track them and keep track of value-added.

We've got three big concerns. One is that data privacy thing, and that's a bedrock issue and we need to be able to ensure there's data privacy or we're gonna have a system that's gonna be hard to implement and cooperation won't be as it should. Nationwide specs. We need to make sure--we sell cattle out of Minnesota to all over the country. We need to build an interface with all those other systems. We buy cattle and feed them here in the state from all over the country. We've got to be able to interface with all those systems.

Finally, we need to share the cost of this. That's critical. Between the industry, government, and we thank you for the wise choice of sending some money here to Minnesota, because we'll make darn good use of it. Make sure we attach strings to that money. Don't allow 50 states to go out and come up with 50 completely different systems. That's not a good use of taxpayer's money.

In closing, take a good look at the systems that Dr. Hartmann and Commissioner Hugoson have put together in Minnesota here to work on this project. They've brought in commodity groups. They've brought in the auction markets to try to deal with this and come up with good local solutions that will make the system work nationwide. And thank you for allowing me to speak.

MR. HAMMITT: I also work at Iowa's Dairy Proteins in Melrose. We are a cheese plant, and I work in a laboratory, so I am basically testing for antibiotics, so I know traceability. And I've been a member of the scrapie--volunteer scrapie program for several years now, and I have not found that it has been an undue burden to keep track of my animals for traceability. And I--that's all I wanted to say.

MR. OLSON: I must be next, because I'm the only one left. I'm Steve Olson. I'm the Executive Director of the Minnesota Turkey Growers Association, and I'm also representing the National Turkey Federation today. I think a lot of the comments that we have likely will be comments that you've already heard, but I think there's value in repetition.

First of all, we agree with the objectives that USDA has outlined today. We see value in animal

disease--or we see this as being a valuable program for animal disease control and food safety. We agree with flexibility to use the systems that are already in place as well as adopting new technologies. We agree with having states run the program. Minnesota's poultry industry has a long and strong history of working with the Board of Animal Health and the Minnesota Department of Agriculture and USDA's Veterinary Services office in the state of Minnesota. We also commend the formation of the poultry working group. We see that as a good way to move forward.

The concerns that we have, again, have been echoed with many of the comments already. We've got--we're concerned with the cost of the system to producers. Our margins are tight and they'll continue to be tight, and that cost--you know, we just don't want that to unduly be a burden on the producers.

Confidentiality of the national database, again, that's been mentioned already. There are groups out there that oppose animal agriculture and would use that information to--against us, and then we'd also like to see this extended to the live bird markets. The avian influenza is the case in point with respect to that.

In closing, I guess, we'd like to see this as a voluntary, confidential program that's also focused on animal disease. Thank you.

MS. THORNHILL: Are there any other speakers that I missed? All right. Thank you very much.

UNIDENTIFIED MALE: There's one right here.

MS. THORNHILL: Oh, there is one. I'm sorry.

UNIDENTIFIED MALE: Two.

MS. THORNHILL: Two? Okay.

MR. ESTES: Thank you. I didn't sign up. Thank you. I'm Stan Estes. I'm a vice president of the Minnesota Farmers Union in Morrison County, and I speak only on my own behalf here. I don't speak for the Minnesota Farmers Union. It's just come to my mind, having raised beef cattle for quite a few years I do know that almost all cows tear the tags off the calves because it's not a natural thing. And I've seen it happen many times. And I'm just wondering whether there was any way anybody could think of that would prevent or make it unnecessary for family farms to have tags in all their cattle or pigs or whatever if they had a limited number, like say up to 40 or something, that they could keep the tags in the drawer as

long as they know each calf and cow and have them identified with the tag if they sell them. In other words, they'd only put them on when they're gonna remove them from the farm. Thank you.

MR. STOLTONO: Thank you. I appreciate the opportunity to have a moment with this group. I'm Earl Stoltono from Sargent County, North Dakota, southeastern quadrant. I wear two hats today; I left mine at home. I represent myself and I was also asked to share a comment or two for the North Dakota Stockmen's Association. We're very proud of the fact that you're giving consideration to the states to operate this program as it is being implemented. We think with national supervision you've got a good act going.

North Dakota Stockmen's Association are hoping--or proposing that they use as much of the assets available that each community or each state has. In North Dakota we have a brand program, and we think it's one of the best in the nation. For identification, I don't think it can be beat. Now, I don't know just how all these things got implemented, but I have a feeling, just from listening, that this program is just about completed. It'll be tweaked a little bit here or a little bit there, or we can go up with the brand programs from 18 or 20 states across the nation and tweak those also and we could call for the identification program.

In North Dakota we can identify a cow for 75 cents. Now, I don't know what the cost of some of these other programs are gonna be, but they're not gonna compare in cost. You'll do well to give consideration to using what is available locally.

The economics of the program is what caught our attention. When we heard the first reports what it was gonna cost each individual to ear tag or put these tags in their ear and have the reading equipment, the electronic equipment, we were all baffled by what type of a program was coming at us, but maybe you can get the cost down where everybody can live with it, because, like one of the gentlemen said, some herds are small, some have got a few. What happens to the 4-H kids and all the way up and down the ladder?

There's costs that are going into it and the latest one I heard was that in one state that has done some work on this, this electronic program is gonna cost him \$7.79 per animal. And I'm sure that it's gonna be many states where it's much higher. Thank you.

MS. THORNHILL: Those are all the speakers for today. Thank you.

(Additional comments were made by Mr. Hawks and Dr. Ragan, and the meeting was adjourned at 10:52 a.m.)